

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

**COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,**

Defendants.

Case No: 7:20-cv-00947-JD

**CONSENT MOTION FOR
EXTENSION OF TIME**

NOW COMES LIMESTONE UNIVERSITY (incorrectly identified as “Limestone College”), a Defendant to the above-captioned action, and hereby pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure moves the Court for an order extending the time within which Defendant Limestone may file a reply to Plaintiffs’ Response to Limestone’s Partial Motion to Dismiss Plaintiffs’ Third Amended Complaint, showing the following:

1.

Pursuant to the filing of Plaintiffs’ Response in Opposition to Defendant, Limestone University’s Partial Motion to Dismiss Plaintiffs’ Third Amended Complaint (“Plaintiffs’ Response,” ECF No. 94), Plaintiffs electronically served Defendant Limestone on or about January 12, 2021.

2.

Pursuant to the Rules, Defendant Limestone has seven (7) days to reply to Plaintiffs’ Response, making Defendant Limestone’s reply to Plaintiffs’ Response due on or about January 19, 2021.

3.

Upon conferring, Plaintiffs' counsel granted counsel for Defendant Limestone a seven (7) day extension to reply to Plaintiffs' Response. Plaintiffs' counsel confirmed this extension in writing.

4.

This is the first extension granted to Defendant Limestone related to Plaintiffs' Response. The new due date would be January 26, 2021.

5.

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings.

6.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose.

WHEREFORE, Defendant Limestone respectfully requests this Court grant Defendant Limestone's Motion and enter an order extending the time in which it may file a Reply by seven (7) days.

(SIGNATURES ON FOLLOWING PAGE)

This 19th day of January, 2021.

RAHIMI, HUGHES & PADGETT, LLC

/s/ JOSEPH Y. RAHIMI II

JOSEPH Y. RAHIMI II

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JOHN A. HUBERT

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CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing **CONSENT MOTION FOR EXTENSION OF TIME** has been served on counsel for all parties by placing same in the United States Mail in a properly addressed envelope with sufficient postage affixed thereon and/or via electronic mail to all other counsel of record to ensure delivery to:

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This 19th day of January, 2021.

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/s/ JOSEPH Y. RAHIMI II

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